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November 9, 2023

Via PACER

Hon. Rukhsanah L. Singh, U.S.M.J.
United States District Court for the District of New Jersey
Clarkson S. Fisher Building & U.S. Courthouse
402 East State Street Room 2020
Trenton, New Jersey 08608

***Re: John Doe v. First Advantage Background Services Corp.
Case No. 3:23-cv-21072-MAS-RLS***

Dear Judge Singh:

This Firm represents Defendant, First Advantage Background Services Corp. ("First Advantage"), in the above-referenced matter.

On October 11, 2023, Plaintiff, John Doe ("Plaintiff"), filed a pseudonymous Complaint [Dkt. 1], along with a Motion for Leave to Proceed Under Pseudonym or, in the Alternative, for Entry of a Limited Protective Order ("Plaintiff's Motion") [Dkt. 3].

On October 23, 2023, First Advantage requested that the Clerk's office enter an Order, pursuant to Local Civ. Rule 6.1(b), extending First Advantage's time to respond to the Complaint to November 17, 2023 [Dkt. 5]. The Clerk entered an Order on October 24, 2023 extending First Advantage's time to answer Plaintiff's Complaint to November 17, 2023.

First Advantage also submitted a request to the Court on October 23, 2023 to adjourn Plaintiff's Motion to November 20, 2023 [Dkt. 8], with Plaintiff's consent, which the Court granted that same day [Dkt. 9].

First Advantage's impending November 17, 2023 deadline to respond to Plaintiff's Complaint falls before the return date of Plaintiff's motion, which is scheduled for November 20, 2023. Because Plaintiff's identity has not been formally revealed in any filing with the Court, it will be problematic to require First Advantage to respond to the specific factual allegations in the Complaint regarding the Plaintiff. First

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Advantage thus requests, pursuant to Local Civ. Rule 6.1, that the Court adjourn First Advantage's time to respond to the Complaint to fourteen (14) days after the Court rules on Plaintiff's Motion.

First Advantage respectfully directs the Court to other District Courts which have issued orders similarly adjourning response deadlines in nearly identical cases filed against First Advantage by the same law firm representing Plaintiff in this matter. *See* Ex. "A" (*John Doe v. First Advantage Background Services Corp.*, Case No. 1:23-cv-01006-SEB-MKK (S.D. Ind.)); Ex. "B" (*John Doe v. First Advantage Background Services Corp. et al.*, C.A. No. 23-0647-CFC (D. Del.)).

Please be advised that Plaintiff's counsel does not consent to this request.

Should this request be acceptable to the Court, we respectfully request that Your Honor enter this letter as "So Ordered."

Thank you for Your Honor's attention to this matter.

Respectfully submitted,

LUM, DRASCO & POSITAN LLC

By: /s/ Scott E. Reiser
SCOTT E. REISER
A Member of the Firm

ARNALL GOLDEN GREGORY LLP


By: /s/ Henry R. Chalmers
HENRY R. CHALMERS, *Pro Hac Vice*

By: /s/ Natalie L. Cascario
NATALIE L. CASCARIO, *Pro Hac Vice*

cc: Levi Y. Edelman, Esq. (via PACER and electronic mail)

Having considered the within and the status of this matter, and exercising the
IT IS SO ORDERED. Court's discretion, the above request is GRANTED.

SIGNED THIS 13th DAY OF November, 2023.


HON. RUKHSANAH L. SINGH, U.S.M.J.